

The Honorable Barbara J. Rothstein

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON - SEATTLE

RICARDO SALOM, CATHERINE
PALAZZO as assignee for Ruben Palazzo,
and PETER HACKINEN, *on their own
behalf and on behalf of other similarly
situated persons,*

Plaintiffs,

vs.

NATIONSTAR MORTGAGE LLC

And

FEDERAL HOME LOAN MORTGAGE
CORPORATION, *on its own behalf and on
behalf of similarly situated persons*

Defendants.

Case No. 2:24-cv-00444-BJR

**DECLARATION OF CHRISTINA L.
HENRY IN SUPPORT OF
PLAINTIFFS' MOTION TO EXCUSE
LATE FILED OPPOSITION**

DECLARATION OF CHRISTINA L. HENRY IN SUPORT OF
PLAINTIFFS' MOTION TO EXCUSE LATE FILED
OPPOSITION

SEATTLE CONSUMER JUSTICE, P.S.
10728 16th Avenue SW
Seattle, WA 98146
Tel# 206-330-0595 / Fax# 206-400-7609

1 I, Christina L. Henry declare as follows:

2 1. I am one of the attorneys of record for the Plaintiffs herein. I have personal
3 knowledge of the facts as stated herein and if called upon to testify to the truth thereof, I could
4 and would do so.

5 2. On behalf of the Plaintiffs, my co-counsel and I filed this lawsuit against
6 Defendants Nationstar Mortgage, Freddie Mac, and a Defendant Clas on April 2, 2022, asserting
7 various causes of action related to the collection of pay-to-pay fees for residential mortgage
8 payoff requests that are not permitted under the contractual agreements or applicable state or
9 federal law. Causes of action pled against the Defendants include breach of contract and in the
10 alternative unjust enrichment, violations of the Fair Debt Collections Practices Act (“FDCPA”),
11 and state consumer protection actions under Washington State and Maryland.

12 3. On August 6, 2024, Defendant Nationstar Mortgage, LLC filed a motion for an
13 extension of time to file an opposition to the Plaintiffs’ motion for class certification, and to stay
14 the discovery in this action (the “Motion:”) until the Court rules on Nationstar’ motion for
15 judgment on the pleadings.

16 4. After reading the Motion, I reviewed the Court’s initial scheduling order (Dkt No
17 16), and mis-read the this Court’s rules for when to file an opposition to an extension of time,
18 and calendared the deadline for August 12th, two days before Nationstar’s deadline to file a
19 response to Plaintiffs’ Motion for Class Certification on August 14th.

20 5. Today, after reviewing Nationstar’s reply to their Motion, noting the opposition
21 was due on August 8th, two days after they filed their Motion, not two days before their response
22 to the Class Certification.

7. I bring this motion in good faith as I did not know the opposition was filed late when I filed it.

EXECUTED this 13th of August 2024 at Bothell, Washington.

SEATTLE CONSUMER JUSTICE, P.S.
10728 16th Avenue SW
Seattle, WA 98146
Tel# 206-330-0595 / Fax# 206-400-7609

Certificate of Service

I hereby certify that a copy of the foregoing and related other filings referenced herein, and proposed order was provided to counsel to record for Defendant Nationstar at the time of filing through the Court's CM/ECF system. In addition, I also hereby certify that a paper copy of the same was sent by pre-paid U.S. Mail to Freddie Mac's General Counsel at:

Heidi Mason
Executive VP & General Counsel
Freddie Mac
8200 Jones Brach Drive
McLean, VA 22102

/s/ Christina L. Henry
Christina L Henry